

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WAG Acquisition, L.L.C.,
Plaintiff,

v.

Sobonito Investments, LTD., *et al.*,
Defendants.

Civil Action No. 2:14-cv-01661
(ES)(JAD)

**NOTICE OF JOINT MOTION
TO DISMISS PLAINTIFF'S
COMPLAINTS**

WAG Acquisition, L.L.C.,
Plaintiff,

v.

Multi Media, L.L.C., *et al.*,
Defendants.

Civil Action No. 2:14-cv-02340
(ES)(JAD)

WAG Acquisition, L.L.C.,
Plaintiff,

v.

Data Conversions, Inc., *et al.*
Defendants.

Civil Action No. 2:14-cv-02345
(ES)(JAD)

WAG Acquisition, L.L.C.,
Plaintiff,

v.

Flying Crocodile, Inc., *et al.*,
Defendants.

Civil Action No. 2:14-cv-02674
(ES)(MAH)

WAG Acquisition, L.L.C.,
Plaintiff,

v.

Gattyán Group S.à r.l., *et al.*,
Defendants.

Civil Action No. 2:14-cv-02832
(ES) (JAD)

WAG Acquisition, L.L.C.,
Plaintiff,

v.

MFCXY, Inc., *et al.*,
Defendants.

Civil Action No. 2:14-cv-03196
(ES)(MAH)

WAG Acquisition, L.L.C.,
Plaintiff,

v.

FriendFinder Networks Inc., *et al.*,
Defendants.

Civil Action No. 2:14-cv-03456
(ES)(JAD)

WAG Acquisition, L.L.C.,

Plaintiff,

v.

Vubeology, Inc., *et al.*,

Defendants.

Civil Action No.2:14-cv-04531
(ES)(JAD)

ON NOTICE TO:

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Attorneys for Plaintiff WAG Acquisition, LLC

PLEASE TAKE NOTICE that on January 20, 2015, or on a date to be set by this Court, Defendants in the above-captioned actions (collectively “Moving Defendants”) will jointly move before the Hon. Esther Salas, U.S.D.J., at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for entry of an Order pursuant to Federal Rules of Civil Procedure 12(b)(6), 12(b)(2) and 12(b)(3) and Local Civil Rule 7.1 dismissing Plaintiff’s Complaints and/or Amended Complaints in the above-captioned matters for failure to state a

claim on which relief can be granted, for lack of personal jurisdiction, and for improper venue.

PLEASE TAKE FURTHER NOTICE that in support of this joint motion, Moving Defendants shall rely on the accompanying Memorandum of Law in Support of Defendants' Joint Motion For Dismissal, along with the supporting Declarations of Michael A. Innes, Leonid Radvinsky and Noam Fogel and upon all pleadings, papers and proceedings on file in these actions. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that Moving Defendants respectfully request oral argument.

Dated: November 14, 2014 Respectfully submitted,

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s/ Keith J. Miller

s/ Leda Dunn Wettre

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*Attorneys for Defendants MFCXY, Inc., LRAM
Company B.V., Leonid Radvinsky,
Cybertania, Inc. and ActiveSoft, Inc.*

CERTIFICATE OF SERVICE

I, **LEDA DUNN WETTRE**, hereby certify that on November 14, 2014, I caused a true and correct copy of the Moving Defendants' Notice of Joint Motion to Dismiss Plaintiff's Complaints and all supporting papers to be served to the following attorneys by the means listed below:

BY EMAIL:

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I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 14, 2014

s/ Leda Dunn Wettre
Leda Dunn Wettre